

1 CHRISTOPHER W. WOOD, SBN 193955
2 LARRY Q. PHAN, SBN 284561
3 **DREYER BABICH BUCCOLA WOOD CAMPORA, LLP**
4 20 Bicentennial Circle
5 Sacramento, CA 95826
6 Telephone: (916) 379-3500
7 Facsimile: (916) 379-3599

8 ESTELA O. PINO, SBN 112975
9 **PINO & ASSOCIATES**
10 1520 Eureka Rd., Suite 101,
11 Roseville, CA 95661
12 Telephone: (916) 641-2288
13 Facsimile: (916) 244-0989

14 Attorneys for the Creditor, Daniel Franklin.

15 THE UNITED STATES BANKRUPTCY COURT
16 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 In re:

19 PG&E CORPORATION,

20 -and-

21 In re:

22 PACIFIC GAS AND ELECTRIC
23 COMPANY,

24 Debtors.

- 25 ☐ Affects PG&E Corporation
26 ☐ Affects Pacific Gas and Electric Company
27 ☒ Affects both Debtors

28 * All papers shall be filed in the lead case, No.
19-30088(DM)

Case Nos. 19-30088 (DM)

Chapter 11

**DANIEL FRANKLIN'S STATEMENT
RE: THE REORGANIZED DEBTORS'
THIRD OMNIBUS OBJECTION TO
CLAIMS (DUPLICATE CLAIMS) RE:
PROOF OF CLAIM OF DANIEL
FRANKLIN**

RELATED DOCKET NOS.: 8753

Creditor, Daniel Franklin ("Mr. Franklin") submits the following statement (the
"Statement") in response to the Notice of the Reorganized Debtors' Third Omnibus Objection to
Claims (Duplicate Claims) with regards to the proofs of claim filed by Mr. Franklin:

1 A. On September 25, 2019, Mr. Franklin timely filed a Proof of Claim, claim number 9829
2 (the "Franklin Proof of Claim"), in the above captioned Chapter 11 cases against Pacific Gas &
3 Electric Company (the "Utility") based on the claims asserted in the "Complaint for Personal
4 Injuries" filed by Mr. Franklin against the Utility and the others in the Superior Court of the State
5 of California, in and for the San Francisco County, Case number 17-559986 (the "Franklin State
6 Court Action").

7 B. On October 7, 2019, Mr. Franklin filed Proof of Claim No. 17096 against the Utility,
8 which amended the Franklin Proof of Claim (the "Franklin Amended Proof of Claim").

9 C. On March 16, 2020, PG&E Corporation and the Utility (collectively the "Debtors" or the
10 "Reorganized Debtors") filed the Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of
11 Reorganization, dated March 16, 2020 [Dkt. No. 6320] (as it may be amended, modified or
12 supplemented from time to time, and together with any exhibits or schedules thereto, the "Plan").

13 D. On May 15, 2020, Mr. Franklin filed a Joinder in the Objection filed by Ravin Skondin to
14 confirmation of the Plan [Dkt. No. 7312] (the "Joinder"). Mr. Franklin also filed joinders in
15 objections to Plan confirmation filed by other creditors and interested parties [Dkt. No. 7335].

16 E. On June 17, 2020, Mr. Franklin, along with another creditor, Ravin Skondin ("Ms.
17 Skondin"), entered into a Stipulation with the Debtors resolving Mr. Franklin's Joinder and
18 objections to the Plan and Ms. Skondin's objections to Plan – Stipulation Resolving Objections
19 To Confirmation Of Debtors' And Shareholder Proponents' Joint Chapter 11 Plan Of
20 Reorganization, Dated March 16, 2020, Filed By Ravin Skondin And Daniel Franklin; And For
21 Relief From The Automatic Stay [Dkt No. 7986] (the "Stipulation Re Objections").

22 F. Pursuant to the Stipulation Re Objections, the operative and the surviving Proof of Claim
23 against the Utility is the Franklin Amended Proof of Claim, Proof of Claim number 17096.

24 G. On June 17, 2020, the Bankruptcy Court entered on the docket of the Bankruptcy Case an
25 Order approving the Stipulation Re Objections [Dkt. No. 8009] (the "Order Approving
26 Stipulation Re Objections").

27 H. On June 20, 2020, the Bankruptcy Court entered an order confirming the Plan [Dkt. No.
28 8053].

1 I. On August 13, 2020, the Reorganized Debtors filed the Reorganized Debtors' Third
2 Omnibus Objection to Claims (Duplicate Claims) [Dkt. No. 8753] (the "Omnibus Objection to
3 Claims").


4 J. Within Exhibit 1 to the Omnibus Objection to Claims, the Reorganized Debtors list the
5 Proofs of Claim that will be disallowed and expunged and also state the corresponding surviving
6 Proof of Claim number.

7 K. Within Exhibit 1 to the Omnibus Objection to Claims, it is reflected that the Franklin
8 Proof of Claim, Proof of Claim number 9829, will be disallowed and expunged, and it will be
9 replaced and survived by the Franklin Amended Proof of Claim, Proof of Claim number 17096.
10 This is consistent with the Stipulation Re Objections and the Order Approving Stipulation Re
11 Objections.

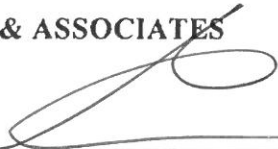
12 L. Accordingly, Mr. Franklin does not object to the very specific and narrow relief sought
13 by the Reorganized Debtors within the Omnibus Objection to Claims, with respect to his proofs
14 of claim.

15
16 Dated: September 3, 2020

Respectfully submitted,
**DREYER BABICH BUCCOLA WOOD
CAMPORA, LLP**

18
19 By: 
20 Larry Q. Phan, Attorneys for
21 Daniel Franklin.

22 **PINO & ASSOCIATES**

23
24 By: 
25 Estela O. Pino, Attorneys for Daniel Franklin.
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